



U.S. Department of Justice

*United States Attorney
Southern District of New York*

*The Silvio J. Mollo Building
One Saint Andrew's Plaza
New York, New York 10007*

June 13, 2022

BY ECF

Hon. Colleen McMahon
United States District Judge
Southern District of New York
500 Pearl Street
New York, New York 10007

Re: *United States v. Laforest*, 21 Cr. 272 (CM)

Dear Judge McMahon:

The parties write in advance of the status conference the Court has scheduled for tomorrow, June 14, 2022, at 2:00 p.m. The parties jointly represent that the case is trial ready and accordingly request that the Court adjourn tomorrow's conference. Counsel have conferred and, based on scheduling conflicts, would propose the Court set a trial date for some time in March 2023 or thereafter convenient for the Court. The parties expect that trial would take approximately one week.

The Government respectfully requests that the Court exclude time from June 14, 2022 through the trial date. An exclusion is in the interest of justice because it will allow the parties to discuss potential dispositions for this case and to prepare for trial. The defendants consent to the exclusion.

Respectfully Submitted,

DAMIAN WILLIAMS
United States Attorney

by: /s/ Matthew R. Shahabian
Matthew R. Shahabian
Assistant United States Attorney
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CC: Counsel of Record (by ECF)